



February 9, 2018

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

Re: Notice of Ex Parte Communication, RM-11787, RM-11727

Dear Ms. Dortch:

On February 8, 2018, Lynn Claudy, David Layer and the undersigned of the National Association of Broadcasters (NAB) met with Albert Shuldiner, Peter Doyle, James Bradshaw, Lisa Scanlan, Thomas Nessinger and Christine Goepp of the Media Bureau's Audio Division, regarding certain radio broadcasting policy issues currently before the Commission.

Specifically, we requested an update on the status of a Petition for Rulemaking that NAB filed last year, which proposed various measures to increase the certainty of translators and facilitate the handling of interference complaints among translators and FM stations.<sup>1</sup> We reiterated that amending the Commission's rules to allow translators to move anywhere on the FM dial to resolve interference,<sup>2</sup> as a minor change, would provide much needed flexibility to translator owners and listeners. We also urged the Division to consider the procedural changes described in the Petition that would clarify the evidence needed for an actionable interference complaint.

NAB thanked the Division for its continued efforts to expeditiously resolve translator interference complaints, but noted that the Commission's successful actions in the AM Radio Revitalization proceeding to substantially increase use of cross-service translators could lead to an increase in the number of such conflicts. Accordingly, NAB respectfully requested that the Bureau promptly advance NAB's petition to a Notice of Rulemaking.

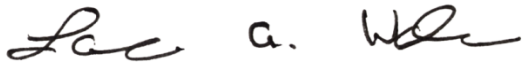
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<sup>1</sup> Petition for Rulemaking, National Association of Broadcasters, RM-11787 (Apr. 20, 2017).

<sup>2</sup> 47 C.F.R. § 74.1233.

In addition, we also discussed a proposal that reportedly has been circulated among the Commissioners to create a new "Class C4" of FM stations in between the Class A and Class C3 services.<sup>3</sup> This new class, first proposed in January 2013,<sup>4</sup> could feature a maximum effective radiated power (ERP) of 12 kW and maximum antenna height of 100 meters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry Walke".

Larry Walke  
Associate General Counsel  
Legal and Regulatory Affairs  
National Association of Broadcasters

cc: Albert Shuldiner, Peter Doyle, James Bradshaw, Lisa Scanlan, Thomas Nessinger and  
Christine Goepp

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<sup>3</sup> *Pai Announces C4 NPRM, Diversity Efforts*, Communications Daily (Feb. 7, 2018).

<sup>4</sup> Petition for Rulemaking, SSR Communications, Inc., RM-11727 (Jan. 22, 2013).